Flexibility Through Rule and Policy

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Goals Are Key

◆ Protect the environment

◆ Ensure the emissions "commodity" is measurable

◆ Minimize cost of data collection

◆ Reduce administrative burden

◆ Continuously improve program functioning

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This Year's Activities to Address Goals

◆ Part 75 Proposed Rule Revisions
  – Simplify compliance by removing obsolete sections
  – Increase flexibility for missing data periods, bypass stacks, and LMEs
  – Improve previously identified areas that needed change

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This Year's Activities to Address Goals

◆ Policy Decisions
  – Analyzers
  – Fuel Flow-to-load
  – Quality Assurance
◆ New Tools
  – Flow methods

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Proposed Rule Changes: Missing Data

◆ New option allowing the use of fuel-specific missing data

◆ New option for add-on control units allowing controlled or uncontrolled missing data substitution based on control operating status

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Proposed Rule Changes: Missing Data, continued

◆ Remove all references to outdated CO_2 missing data routines

◆ Add non-load based missing data procedures for units that do not produce electrical or thermal output (e.g., cement kilns, process heaters)

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Proposed Rule Changes: Bypass Stacks

◆ Option to report fuel-specific maximum values instead of monitoring bypass stack

-Allows use of MPC (maximum potential concentration) for SO_2 and CO_2

-Allows use of NOx MER (maximum potential emission rate)

-Allows use of MPF (maximum potential flow)

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Proposed Rule Changes: LMEs

◆ Clarify qualification, certification, and reporting requirements

◆ Allow turbines with water injection, water-to-fuel injection, or steam injection to use tested defaults below 0.15 lb/mmBtu

◆ Allow uncontrolled diffusion flame turbines to correct fuel- and unit-specific NOx emission rates to standard conditions

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Proposed Rule Changes: LMEs, continued

◆ Allow single-load testing for units that operate at one load level ≥ 85% of the time

◆ Allow single load testing for turbines which operate at a predetermined temperature

◆ Allow base-load testing for peaking turbines used primarily at base load

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Proposed Rule Changes: Subpart H

◆ Expand and clarify the missing data procedures and QA requirements for sources that report data only during the ozone season

◆ Lay out protocols for ozone season (rather than the calendar year) compliance period

◆ Instructions added to EDR v.2.1 for ozone season only reporting

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Proposed Rule Changes: Appendix D

◆ Clarify missing data routines and how/when to do sampling
◆ Put fuel characterization on a total Sulfur basis (vs. H_2S)
◆ Add equation for calculating unit heat input rate when multiple fuels are combusted

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Proposed Rule Changes: Appendix E

◆ Revise missing data procedures
◆ Revise retesting frequency to once every 20 calendar quarters (5 years) for all fuels
◆ Add instructions on what to report when actual heat input exceeds maximum HI on correlation curve; or NOx controls are not operating or out of acceptable ranges

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Policy on Like-Kind Replacement Analyzers

◆ Section 7 of Policy Manual

◆ We now allow use of like-kind replacement gas analyzers, provided:

– Limited to 720 hours a year

– Perform linearity when you bring it on-line

– Use the same monitoring system ID but different component ID

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RT 510

Status	Sys ID	Sys Param	Comp ID	Comp type
U	101	SO2	211	SO2
A	101	SO2	LK1	SO2
U	101	SO2	999	DAHS

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Policy on Dual Range Analyzers

◆ Section 10 of Policy Manual

◆ Allows averaging 200% of MPC for spikes with real low-range data when using default high range option

◆ Flag in EDR with MODC of 19

◆ Same concept for overscaling - going off the high range: can average spike with hourly data

Policy on Use of Mid-Level Cal Gas

◆ Section 10 of Policy Manual

◆ Provides flexibility to use high or mid-level cal gas for daily cals - your choice

◆ DAHS needs to flag it properly with H or M in Record Type 230

Policy on Electronic QA Plans

◆ Policy says QA Plans may be stored electronically if you can produce them on request by an auditor or inspector

◆ Saves paper and space

◆ Currently the rule allows for monitoring plans information to be stored electronically so we're going the next step

◆ Rule revisions will finalize

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Policy on Fuel Flow to Load Test

◆ Section 25 of Policy Manual

◆ Optional quarterly test to extend QA on fuel flow meters for up to 5 years

◆ Not a requirement but can lessen QA frequency and allows us to feel confident meter is reading accurately on a quarterly basis

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Policy on Appendix E Missing Data

◆ Section 26 of Policy Manual

◆ Previously, when HI rate is above maximum rate on correlation curve, use one of two options: linear extrapolation or the MER, whichever is highest

◆ Now allow 1.25 times the highest NOx point on the correlation curve (which should be less conservative)

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Software for Flow Test Methods 2F, 2G, and 2H

◆ Policy Manual Questions 3.26-3.35

◆ Developed new software that helps do calculations and puts data in EDR format

◆ Can manually enter data on site when doing testing

◆ Visit our booth for a live demonstration!

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Coming Soon (Stay Tuned!)

◆ Recertification Events Policy

◆ Searchable Policy Manual

◆ Electronic Policy Newsletter

◆ Turbine Policy Initiative

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Clean Air Markets Website

◆ www.epa.gov/airmarkets

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